



Tennessee Department of Environment and Conservation
Division of Water Pollution Control
L & C Tower Annex, 6th Floor
401 Church Street
Nashville, Tennessee 37243

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

PURPOSE

The purpose of this Notice of Intent (NOI) is for a Tennessee city, county, utility district, university or military base to apply for NPDES permit to discharge stormwater runoff from a Phase II municipal separate storm sewer system.

INSTRUCTIONS

You must provide the following information to the Division of Water Pollution Control as application material. You may either submit a hard copy of the original NOI as described in sub-part 2.3 of the MS4 Permit, signed in accordance with the signatory requirements of sub-part 6.7 of the permit, and a copy of the NOI, to the address shown in sub-part 1.2 of the permit for the EFO responsible for the county where the facility is located; or you may submit by e-mail, with the completed NOI and attachments (such as map and city ordinances) to phase.two@tn.gov.

In addition, send an original, hard copy letter, signed by the responsible official of the MS4, which makes reference to the e-mail transmission including date and time that the electronic submitted was made. The letter must contain the signatory statement found on the NOI form. The letter must be mailed to the Nashville Central Office address as defined in sub-part 1.2 of the MS4 permit.

After completing the questions in each section, list the Best Management Practices (BMPs) that you will implement in each area based on a set of priorities you have identified in the area. Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

After completing the BMP's in each section provide the administrative information to complete those BMP's as explained here:

Primary Contact and Position/Title	The person in your organization serving as the primary contact.
Other Department and Roles	Other departments within your organization involved in the project and how their role is identified.
Other Government Entity and Roles	Identification of other government entities responsible for implementing one or more of the BMP's. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.
Other Institutions and Roles	Identification of partnerships with another MS4 operator or institution (e.g., Chamber of Commerce, environmental interest organizations, civic groups) to achieve the BMP's.
Target Groups (if applicable)	Specific kinds of groups that will be targeted, such as service industries (i.e., carpet cleaning), civic groups, schools, and church groups, etc.

PART I
ADMINISTRATIVE INFORMATION

Name of city, county, stormwater utility district or other public institution that operates a Phase II MS4: City of Springfield

Billy Paul Carneal

Responsible Elected Official or Officer

Mayor

Title

405 North Main
Street Address

Springfield
City

Tennessee
State

37172-2408
Zip Code

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PROGRAM CONTACT

Allan Ellis

Name

aellis@springfield-tn.org

Email Address

615-384-2746

Phone Number

TECHNICAL CONTACT

Allan Ellis

Name

aellis@springfield-tn.org

Email Address

615-384-2746

Phone Number

☒ Attach an organizational chart that shows the different departments involved in stormwater management.

PART II
DESCRIPTION OF STORM SYSTEM

ITEM A
AREA SERVED (IN SQUARE MILES)

If city, town, university, or utility district: Give jurisdiction area within current corporate boundaries

11.94
square
miles

If city, town, university, or utility district: Give additional area of urban growth boundary

23.90
square
miles

If county: Give total area _____ Area unincorporated _____ Unincorporated, urbanized area (UA) _____

If county, indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of your county:

Entire county (unincorporated) ☐

Non-UA portions, as follows (describe below) ☐

ITEM B
STORM DRAINAGE INFRASTRUCTURE

Give figures for the following features of stormwater drainage infrastructure owned or operated by the local government. For a county government, indicate whether the figures represent the entire county or only the urbanized area. Figures for length and number of culverts and catch basins may be rough estimates.

For counties: Entire county ☐ Urbanized area only ☐

Storm Sewers 10 miles (miles, or feet)

Open Ditches 100 miles (miles, or feet)

Culverts 500

Catch Basins 1520

Retention Basins 0

Detention Basins 20

ITEM C
MAPS

Please include a map or maps depicting the following information. A single map may be submitted, as long as the information is legible. If you are not able to provide all the information please mark the applicable check box and attach an explanation as to why the information has not been submitted:

Zoned areas for commercial or industrial activity ☒
Actual areas of commercial or industrial activity ☐
Other municipally owned/operated industrial activities ☒
Municipal or County Wastewater Treatment Plants ☒
Vehicle Fleet Maintenance Centers ☒
Power Plants ☐
Airports ☒

State vocational, technical, college or universities ☒
Federal vocational, technical, college or universities ☒
City Roads ☒
County Roads ☒
Perennial and intermittent streams ☒
Topography or Drainage Patterns ☒
Landfills ☒

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Military Installations



**CITY OF SPRINGFIELD
2010 PHASE II PERMIT NOI
PART II – ITEM C
MAPS**

The following map information was submitted with the NOI:

- Zoned areas for commercial or industrial activity
- Other municipally owned/operated industrial activities
- Municipal or County Wastewater Treatment Plants
- Vehicle Fleet Maintenance Centers
- Airports
- State vocational, technical, college or universities
- Federal vocational, technical, college or universities
- City roads (roads are shown but not identified as whether they are state, county or private)
- County roads (roads are shown but not identified as whether they are state, county or private)
- Perennial and intermittent streams
- Topography or Drainage Patterns
- Landfills
- Military Installations

The following map information was not submitted with the NOI because the data was not readily available or has not been developed but will be developed during the first permit year:

- Actual areas of commercial or industrial activity

The following map information was not submitted with the NOI because the data is not applicable for the City of Springfield:

- Power Plants

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**ITEM D
IDENTIFYING IMPAIRED STREAMS AND OTHER WATER BODIES**

Using the GIS mapping tool (<http://tnmap.tn.gov/wpc/>) along with the most current 303(d) list published on the division's web site (<http://www.tn.gov/environment/wpc/publications/#wqassessment>), identify whether stormwater discharges from any part of the MS4 contribute pollutants of concern to an impaired waterbody and list below: For any impairment, indicate the waterbody ID#, name of impacted waterbody, nature of pollution (cause), and the source. If you have additional streams to list, please include in a separate attachment.

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	CAUSE OF IMPAIRMENT	SOURCE OF IMPAIRMENT
TN05130206 (003-1200)/Carr Creek	E-Coli	Collection System Failure
TN05130206 (003-1220)/Trib-Carr Ck.	Nutrients/Thermal Modifications/E-Coli	Municipal Point Source
TN5130206 (003-3000)/Sulphur Fork	Nitrate+Nitrite/T.Phosphorous./Siltation	Major Discharges from MS4
TN05130206 (003-1250)/Carr Creek	Nitrate+Nitrite/Total Phosphorous	Collection System Failure
TN05130206 (003-1255)/Carr Creek	Nitrate+Nitrite/T. Phosphorous/E-Coli	Collection System Failure

**ITEM E
HAS THE STATE OR EPA ISSUED A TMDL FOR ANY STREAMS DIRECTLY AFFECTED BY RUNOFF FROM YOUR MS4?**

Determine whether or not a TMDL has been established and approved by EPA and identify by checking the appropriate box. A list of EPA-Approved TMDLs as well as EPA-Established TMDLs for Tennessee waters can be found on the division's web site (<http://www.tn.gov/environment/wpc/tmdl/approved.shtml>).

Yes ☒ No ☐ If yes, list the waterbody ID#, name of impacted waterbody and parameter(s) of concern:

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	PARAMETERS OF CONCERN
TN05130206 (003-1200)	Carr Creek/E-Coli
TN05130206 (003-1220)	Unnamed Tributary to Carr Creek/E-Coli
TN05130206 (003-1255)	Carr Creek/E-Coli

If you have additional streams to list, please include in a separate attachment.

**PART III
EXISTING LEGAL AUTHORITY TO CONTROL STORMWATER DISCHARGES TO MS4**

You must review ordinances that are associated with stormwater discharges to your MS4. Attach a copy of ordinances that give your MS4 the authority to control stormwater discharges into the MS4 storm sewer system. Ordinances that deal with stormwater issues might be found, for example, in conjunction with litter control, prohibition of dumping, clean up of spills, grading/building permits, sewer connection ordinances, erosion and sediment practices, subdivision regulations or other land use/development ordinances.


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PART IV
SIGNATURE OF RESPONSIBLE CORPORATE OFFICER

This Notice of Intent (NOI) must be signed as follows: For a municipality, state, federal, other public agency, and/or co-permittees by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes one of the following:

- i. The chief executive officer of the agency.
- ii. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

 Signature	Mayor/City of Springfield Title/Municipality	12-21-10 Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date

(Go to next page.)

PART V
YOUR PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM

This NOI requires you to provide a brief description of your current and proposed activities as well as your Best Management Practices (BMPs) for a stormwater management program. The following sections correspond to the six minimum control measures for a Phase II stormwater management program. If another MS4 will be responsible for implementing any or all portions of any or all following six minimum measures, then attach either the interlocutory agreement or the proposed agreement and schedule for adoption. You must still complete this NOI by answering the relevant questions for the six following measures.

For purposes of this NOI, the Public Education and Outreach and Public Participation and Involvement minimum measures have been combined.

SECTION 1
PUBLIC EDUCATION AND OUTREACH AND PUBLIC INVOLVEMENT/PARTICIPATION

A. Current Activities:

The following is a set of questions on your current Public Education and Outreach and Public Involvement/Participation. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently distribute educational materials on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the materials, including media used (e.g., written brochures, public service announcements, etc.); the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒

City distributes educational materials for storm water quality, pollution prevention, construction and farmer's guides for clean water to appropriate audiences. The brochures are available at City Hall for citizens to pick up and also distributed to schools for use in their curriculum so children would begin realizing the effects certain activities have on water quality. The public education materials are given to the principal to distribute. Example brochures include: Howowner's Guide to Cleaner Water: How preserving water begins at home with preventive measures; Farmer's Guide: Preventive measures that can be used on the farm; and Construction Guide: Maintaining BMPs on site. Public Service Announcements are performed through participation in TNSA's statewide TAB public education campaign; topics run by TAB are targeted to all types of audiences. The City also has a Storm Water Fact Sheet on its website which has contact numbers for citizens to call and ask questions or report storm water related complaints. The web site also has a page for Minimizing Storm Water Pollution: What You Can Do. The City also distributes a Memorandum to engineers, contractors and developers on the City's NPDES Storm Water Permit, which briefly explains conditions of the permit and what is required.

No ☐

2. Does the municipality currently conduct or participate in public outreach activities focusing on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the outreach activities, topic(s) covered, intended target audience(s), and the frequency of activities.

Yes ☐

No ☒

3. Does the current municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☐

No ☒

B. Proposed Activities:

List the BMPs that you will implement in the areas of Public Education and Outreach and Public Participation and Involvement. These should be based on a set of priorities that you have identified in the areas of Public Education and Outreach and Public Participation and Involvement. Provide a short descriptive name to the BMP in the left column. In the right column, more fully describe the BMP.

For Public Participation and Involvement BMPs, you may not desire to dictate the ways in which the public participates or is involved in the stormwater quality management program; in this case, your proposed program should provide a forum and a structure by which to encourage or allow the public to participate. On the other hand, there may be specific ways you do want the public to be involved, based on your program needs. For instance, you may want stream watch groups to be organized. As such, your proposed program should describe how you will accomplish this, and the time schedule.

PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION		
BMP	Name	DESCRIPTION

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1A.	Public Education - Hot Spots	Identify and develop a list of hot spots as defined in the storm water general permit, distribute brochures applicable for hot spot, and educate personnel about proper storm water management to improve water quality
1B.	Storm Water Hot Line/Website	City will maintain dedicated hot line for public to report storm water quality complaints/illegal discharges/illegal dumping, etc. - website will be updated to include storm water quality information for public
1C.	PSAs	City will continue PSAs through Tennessee Storm Water Association program
1D.	Annual Report	Hold public meeting to present City's annual storm water report to public

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable:

Residents of older neighborhoods/car washes/restaurants/gas stations/auto parts stores/industries/carpet cleaners

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
PRIMARY CONTACT	POSITION OR TITLE
Allan Ellis	Director of Public Works

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Public Works	Identify hot spots/distribute public education materials to hot spots
Water and Sewer	Public education for septic systems/inspect for and remove cross connections
Engineering	Maintenance of website

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

SECTION 2
ILLICIT DISCHARGE DETECTION AND ELIMINATION

The following are common sources of illicit discharges to an MS4:

- Sanitary Wastewater
- Car wash wastewaters
- Effluent from septic tanks
- Improper oil disposal

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- Radiator flushing disposal
- Spills from roadway accidents
- Carpet cleaning wastewaters
- Laundry Wastewaters/gray water
- Improper disposal of auto and household toxics

A. Current Activities

The following is a set of questions on your current Illicit Discharge Detection and Elimination Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STORM SEWER SYSTEM MAP

Does the municipality currently have a storm sewer system map completed for the entire regulated municipal separate storm sewer system? The map must depict, at a minimum: city streets, topography or drainage patterns, streams, and outfalls (points where the city or county-operated MS4 discharges into the streams or adjacent MS4s).

Yes ☐

No ☒

ILLICIT DISCHARGE ORDINANCES

1. Does the municipality currently have an ordinance or regulatory mechanism that prohibits non-stormwater discharges into the storm sewer system? If yes, please attach a copy of the ordinance and give page number(s) of this section of ordinance. If No, proceed to the next section (inspections and enforcement).

Yes ☒

No ☐

23

Page Number

Section 9

Ordinance Section Number

2. Does the ordinance or regulatory mechanism clearly define non-stormwater discharges, either through a written description of a non-stormwater discharge or through a listing of unallowable or allowable non-stormwater discharges?

Yes ☒

No ☐

3. Does the ordinance or regulatory mechanism allow right-of-entry on private property for inspection of suspected discharges?

Yes ☒

No ☐

4. Does the ordinance or regulatory mechanism prohibit dumping?

Yes ☒

No ☐

5. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to eliminate non-stormwater discharges in the event of violations? If yes, please note page number and paragraph number.

Yes ☒

No ☐

Page Number

8-605 (1) a. Paragraph Number

Ordinance

87-04

6. Does the ordinance or regulatory mechanism define penalties for violations? If yes, please note maximum penalty, page number and paragraph number.

Yes ☒

No ☐

\$5,000.00

Maximum Penalty

29

Page Number

10.4.3.4

Paragraph Number

7. Does the municipality have ordinance or other regulatory mechanism that prohibits contamination of stormwater runoff from "hot spots" including industrial and commercial properties, restaurants, auto repair shops, auto supply shops, and large commercial parking areas?

Yes ☐

No ☒

INSPECTION/SCREENING AND ENFORCEMENT PROCEDURES

1. Does the municipality presently have personnel and procedures in place for inspection and/or screening for non-stormwater discharges? If yes, please describe and indicate percentage of system inspected and/or screened.

Yes ☐
No ☒

Initial outfall screening has been performed but an illicit discharge screening procedure has not been developed

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2. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, please describe.

Yes ☐
No ☒

3. How are enforcement actions documented?

Enforcement actions are documented by the Public Work Inspector (Level II certified) on the City of Springfield Storm Water Construction Site Inspection Report. The Inspector informs the Project Manager on site and/or Project Owner of any violations. The Inspector will inform the Project Manager or Owner of what BMP's need to be implemented, maintenance required, or any other corrective action that is needed.

If any of the actions are not corrected in a timely manner then the Director of Public Works will contact the Codes Department to issue a stop work order for that particular site. The Director of Public Works then will write a Notice of Violation and send it by certified mail to the Owner.

4. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspections? If yes, please describe and provide a map of illicit discharge screening hot spots.

Yes ☐
No ☒

PUBLIC INPUT AND COMPLAINTS

1. Does the municipality presently have procedures in place to receive and consider information and complaints about non-stormwater discharges that are submitted by the public? If so, provide brief description: responsible departments, personnel, steps followed.

Yes ☒
No ☐

Public Works Department (PWD) is responsible for maintaining hot line for reporting of non-storm water discharges/PWD personnel follows up on complaints and PWD sends letter to responsible party for steps to remove non-storm water discharges and conducts follow-up inspections for removal of source of non-storm water discharge

EDUCATION

1. Has the municipality educated the public and businesses including auto parts supply, auto repair shop and restaurants, regarding ways to detect, prevent and eliminate illicit discharges? If yes, briefly describe the educational materials, including media used (e.g., written brochures, public service announcements, etc.), the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☐
No ☒

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Illicit Discharge Detection and Elimination. These should be based on a set of priorities that you have identified in the area of Illicit Discharge Detection and Elimination. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION		
BMP	Name	DESCRIPTION
2A.	Illicit Discharge Ordinance	Modify existing storm water ordinance to prohibit contamination of storm water runoff from hot spots/incorporate allowable discharges identified in general permit
2B.	Storm System Map	Update existing storm water outfall map to meet general permit conditions (hot spots will be identified on map)
2C.	Implement Illicit Discharge Program	An illicit discharge plan and procedures will be developed to meet requirements of the general and will include targeting hot spots and field screening for storm water outfalls
2D.	Public Education for illicit discharges	Public education program will be developed to educate public targeted audiences about water quality impacts of illegal discharges and improper disposal of wastes into the storm sewer system

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Residents of older neighborhoods/car washes/restaurants/gas stations/auto parts stores/industries/carpet cleaners

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C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
PRIMARY CONTACT	POSITION OR TITLE
Allan Ellis	Director of Public works

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Water and Sewer	Identify and remove illegal connections
Public Workst	Visual observation for illicit discharges during routine duties
Codes	Visual observation for illicit discharges during routine inspections

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

SECTION 3
CONSTRUCTION SITE STORMWATER RUNOFF PROGRAM

A. Current Activities

The following is a set of questions on your current Construction Site Stormwater Runoff Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

CONSTRUCTION SITE RUNOFF ORDINANCES

1. Do the current ordinances/regulations for the municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☐
No ☒

2. Do you currently have an erosion prevention and sediment control - or similar - ordinance or regulatory mechanism? If yes, include a copy and reference the page number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes ☒ No ☐ 11 Page Number

3. Does the ordinance or regulatory mechanism require that site operators implement erosion prevention, sediment control, and other construction waste controls for land disturbance activities?

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No ☒

- Yes ☒ No ☐ 11 Page Number 6.2 Paragraph Number

- Yes ☒ No ☐ 12 Page Number 6.2.2 Paragraph Number

- Yes ☐ No ☒

- Yes ☐ No ☒

- Yes ☒ No ☐ 13 Page Number 6.2.4.4 Paragraph Number

- Yes ☒ No ☐ 12 Page Number 6.2.1 Paragraph Number

- Yes ☐ No ☒ Page Number Paragraph Number

- Yes ☒ No ☐ 6 Page Number 4.2 Paragraph Number

- Yes ☒ No ☐ 337 - Zoning Ordinance Page Number 1403.4.1.2 Paragraph Number

CONSTRUCTION SITE PLANS REVIEW

- Yes ☒ No ☐

- Yes ☒ No ☐

- Yes ☒ No ☐

- Planning Department sends out the Site Plans to each Department within the City to review and make written comments on any items that need to be addressed or corrected. Director of Public Works & Engineer (Level II certified) will review the Plans for storm water erosion control and proposed BMPs for the referenced site. These written comments are sent to the Engineer of Record on the Site Plan to correct. Upon receipt and review of revised plan, PW will approve or disapprove proposed Final Plan. Grading permit is not issued until this approval and erosion control for site is installed and inspected

RESPONDING TO PUBLIC INPUT AND COMPLAINTS

- 11

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Yes ☒

No ☐

If Yes, please provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, and personnel (by title). If available, provide information on complaint tracking, documentation, etc:

Complaints are received in the Public Works Department and Public Works personnel investigate and correct the source of the complaint as necessary. The outcome is documented and placed in a file.

ENFORCEMENT AND INSPECTION PROCEDURES

1. Does the municipality presently have personnel and procedures in place for construction site runoff inspection?

Yes ☒

No ☐

2. Does the program provide for pre-construction meeting and monthly inspection of priority sites?

Yes ☒

No ☐

3. Does the municipality presently have procedures and personnel in place for enforcement to the maximum extent for violations of construction site requirements?

Yes ☒

No ☐

4. Does the municipality use a STOP WORK order to enforce non-compliance with construction site policies and requirements?

Yes ☒

No ☐

5. How are enforcement actions documented?

Enforcement actions are documented by the Public Work Inspector (Level II certified) on the City of Springfield Storm Water Construction Site Inspection Report. The Inspector informs the Project Manager on site and/or Project Owner of any violations. The Inspector will inform the Project Manager or Owner on what BMP's need to be implemented, maintenance required, or any other corrective action that is needed. If any of the actions are not corrected in a timely manner than the Director of Public Works will contact the Codes Department to issue a stop work order for the particular site. The Director of Public Works then will write a Notice of Violation and send a certified copy to the Owner.

TRAINING AND EDUCATION

1. Does the municipality presently make construction site runoff control training/information available to the public, developers, engineers, and contractors? (Be aware that the state of Tennessee regularly conducts erosion prevention and sediment control classes across the state. Local governments are encouraged to refer developers and contractors to these classes).

Yes ☐

No ☒

2. Has municipal staff completed state-sponsored training, including the Tennessee Fundamentals of Erosion Prevention and Sediment Control; and the Erosion Prevention and Sediment Control Design Course?

Yes ☒

No ☐

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Construction Site Runoff Program. These should be based on a set of priorities that you have identified in the area of Construction Site Runoff Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM		
BMP	Name	DESCRIPTION
3A.	Construction Site Ordinance	Revise construction site ordinance to be consistent with the current CGP and municipal general storm water permit requirements.
3B.	Priority Construction Sites	Develop procedures for recognizing and inspecting priority construction sites.
3C.	Construction Site Runoff Program Plan	Develop a construction site runoff program with standard operating procedures as part of the City's storm water management program.
3D.	Enforcement of Erosion and Sediment Control Requirements	Evaluate existing enforcement program for erosion and sediment control violations and modify as necessary.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

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Developers/Engineers/Contractors

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR CONSTRUCTION SITE RUNOFF PROGRAM	
PRIMARY CONTACT	POSITION OR TITLE
Allan Ellis	Director of Public Works

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Engineering	Review erosion and sediment control plans
Public Works	Inspection of construction sites

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

SECTION 4
PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT
IN NEW DEVELOPMENT AND REDEVELOPMENT PROGRAM

A. Current Activities

The following is a set of questions on your current Permanent Stormwater Management in New Development and Redevelopment Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STRUCTURAL AND NON-STRUCTURAL STRATEGIES

1. Does the municipality currently have in place mechanisms or strategies to address permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more? For example, land use planning requirements, zoning directives, site-based local controls such as riparian buffer zone protection; storage or detention of stormwater prior to release to streams; practices to cause stormwater to percolate the soil rather than runoff immediately; vegetative practices.

Yes ☒

No ☐

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If Yes, please provide a brief narrative of - and/or references to - the structural and non-structural strategies, describing strategies implemented, Best Management Practices allowed, technical guidance, responsible departments, and personnel (by title).

Section 6.4 of the storm water ordinance requires on site BMPs to be mandatory for all developments subject to review by the Department of Public Works and encourages BMPs be implemented that optimize use of green and open spaces and that structural BMPs be designed to treat the first flush (1.1 inches) of storm water runoff. Section 6.5 of the storm water ordinance requires that waterway buffers be protected and Section 6.3.1.1 contains detention requirements.

PERMANENT STORMWATER CONTROLS SITE MANAGEMENT ORDINANCE

1. Do you currently have an ordinance or regulatory mechanism that addresses permanent stormwater runoff management from new development and redevelopment projects? If yes, reference the page number in your ordinance. If No, proceed to the next section on permanent stormwater management plans review.

Yes ☒ No ☐ 17 Page Number 6.4 Paragraph Number

2. Does the ordinance or regulatory mechanism require controls to mitigate pollutants in stormwater runoff? If yes, note page number and paragraph number.

Yes ☒ No ☐ 17 Page Number 6.4 Paragraph Number

3. Does the ordinance or regulatory mechanism require (explicitly or implicitly) that controls be implemented for any new development or redevelopment projects greater than or equal to one acre, including projects less than one acre that are part of a large common plan of development or sale, that discharge into your small MS4? If yes, note page number and paragraph number.

Yes ☒ No ☐ 17 Page Number 6.4 Paragraph Number

4. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls (e.g., design of detention basins)? If yes, note page number and paragraph number.

Yes ☒ No ☐ 15 Page Number 6.3.1.1 Paragraph Number

5. Does the ordinance or regulatory mechanism clearly define the criteria for submittal -who must submit - of permanent stormwater management design information or plans? If yes, note page number and paragraph number.

Yes ☒ No ☐ 13 Page Number 6.2.4.4 Paragraph Number

6. Does the ordinance or regulatory mechanism require approval prior to construction of permanent stormwater management controls? If yes, note page number and paragraph number.

Yes ☒ No ☐ 12 Page Number 6.2.1 Paragraph Number

7. Does the ordinance or regulatory mechanism require re-submittal of permanent stormwater management design information or plans if site plans change after the initial design has been approved? If yes, please note page number and paragraph number.

Yes ☐ No ☒ Page Number Paragraph Number

8. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to penalize the owner of permanent stormwater management controls for violations? If yes, note page number and paragraph number.

Yes ☒ No ☐ 27 Page Number 10 Paragraph Number

9. Does the ordinance or regulatory mechanism allow the municipality right-of-entry on property where permanent stormwater management controls are installed for inspections? If yes, please note page number and paragraph number.

Yes ☒ No ☐ 6 Page Number 4.2 Paragraph Number

10. Does the ordinance or regulatory mechanism require that permanent stormwater management controls have adequate and long-term operation and maintenance? If yes, please note page number and paragraph number. If no, how does the MS4 owner/operator maintain permanent stormwater management controls?

Yes ☒ No ☐ page 21/paragraphs 8.1 to 8.5

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11. Does the ordinance or regulatory mechanism require establishment and maintenance of water quality buffers in areas of new development and redevelopment?

Yes ☒

No ☐

PERMANENT STORMWATER MANAGEMENT PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment with regard to the impact that permanent stormwater runoff will have on receiving streams?

Yes ☒

No ☐

If Yes, provide a brief narrative or a flow chart of the review process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

Plans are submitted to the department of Public works and reviewed by the Director of Public Works, Engineering Department (City Engineer) and storm water consultant. The storm water component of plans for the proposed development are reviewed for compliance with the City's storm water ordinance.

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Permanent Stormwater Management Plans Review Program. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW		
BMP	Name	DESCRIPTION
4A.	Post-Construction Ordinance	Revise existing storm water ordinance to incorporate post-construction general storm water permit requirements such as management of water quality buffers.
4B.	Post-Construction Procedures	Develop a post-construction strategy and standard operating procedure as part of the City's storm water management program.
4C.	Post-Construction BMP Guidance	Adopt appropriate guidance manual for post-construction BMPs applicable for the City of Springfield.
4D.	Maintenance Requirements for post-Construction BMPs	Revise maintenance requirements to meet new general storm water permit.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Developers/Owners/Engineers/Contractors

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW	
PRIMARY CONTACT	POSITION OR TITLE
Allan Ellis	Director of public works

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Engineering Department	Plans review
Public Works	Inspections of post-development BMPs

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Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

SECTION 5
POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

A. Current Activities

The following is a set of questions on your current Pollution Prevention/Good Housekeeping for Municipal Operations Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STAFF EDUCATION AND TRAINING

1. Does the municipality's current operation and maintenance program provide annual training for staff on preventing and reducing stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance?

Yes ☐

No ☒

2. Are training activities documented? If yes, please describe training and method of record-keeping.

Yes ☐

No ☐

MUNICIPAL OPERATIONS POLLUTION PREVENTION

1. Does the municipality's operations and maintenance program have policies and procedures in place that address pollution prevention? If yes, please describe procedures. Consider the following in your response: maintenance activities, maintenance schedules; long term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways; controls for reducing or eliminating pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance areas with outdoor storage areas, salt/sand storage areas, snow disposal areas, waste transfer stations; disposal of waste removed from storm sewers and the areas listed above; and assessment of impacts on water quality from new flood management projects.

Yes ☐

No ☒

MUNICIPAL INDUSTRIAL ACTIVITIES

1. Has the MS4 owner/operator obtained a Tennessee Multi-Sector General Permit or a no-exposure waiver for all qualifying municipal industrial activities? If yes, please give permit numbers or attach copies of the No-Exposure Certification form.

Yes ☐

No ☒

Permit Numbers(s) _____

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2. List municipally-owned or operated facilities that have a notable potential for contaminating runoff: for example - vehicle maintenance garages; waste transfer operations; golf courses; salt or other materials storage; landfill. If more than one facility for a given type of operation; give the number of such facilities. Indicate if any of these are covered by an NPDES permit. Is there a documented pollution prevention plan in place for these facilities?

FACILITY OR TYPE OF OPERATION	NUMBER OF FACILITIES	IS ACTIVITY COVERED BY NPDES PERMIT?	IS A POLLUTION PREVENTION PLAN IN EFFECT?
Public Works Facility	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Springfield-Robertson County Airport	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Old Springfield Landfill	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Legacy Golf Course	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Pollution Prevention and Housekeeping Program. These should be based on a set of priorities that you have identified in the area of the Pollution Prevention and Housekeeping Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

In addition to considering industrial-type operations, you must also consider municipal infrastructure, and related maintenance activities, maintenance schedules and long-term inspection procedures for structural controls and the proper disposal of waste from storm sewers/catch basins, etc. Also included in this program area is discharge of pollutants from roads and parking lots

PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING		
BMP	Name	DESCRIPTION
5A.	Operation and Maintenance Program	Develop and implement an operations and maintenance program with a training component and standard operating procedures as part of the City's storm water management program to reduce storm water pollution from municipal operations.
5B.	Pollutant Reduction From Streets and Roads	Review existing procedures to reduce pollutants conveyed by storm water runoff from street and road surfaces and revise as necessary
5C.		
5D.		

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Public Works/Parks/Codes/Engineering staff

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR POLLUTION PREVENTION AND HOUSEKEEPING	
PRIMARY CONTACT	POSITION OR TITLE
Allan Ellis	Director of Public Works

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Parks.	Review policies related to pesticide, herbicide and fertilizer use

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Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP

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**ADDENDUM TO SMALL MS4 NPDES PERMIT NOTICE OF INTENT
BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND MILESTONES**

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures. If necessary, please attach additional BMP MEASURABLE GOALS AND MILESTONES as a separate attachment.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP. The BMPs you list here should match exactly those given in Part V., 1-5 of this NOI. For purposes of this NOI, the Public Education and Outreach and Public Involvement/Participation minimum measures have been combined.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year.

BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
BMP 1A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Public Education - Hot Spots
Milestone Year 1	Identify and develop a list of hot spots as defined in the storm water general permit, distribute brochures applicable for hot spot, and educate personnel about proper storm water management to reduce pollutants entering the storm water system
Milestone Year 2	Visit each hot spot for review of storm water pollution prevention practices and distribute public education materials to new facilities qualifying as hot spots
Milestone Year 3	Visit each hot spot for review of storm water pollution prevention practices and distribute public education materials to new facilities qualifying as hot spots
Milestone Year 4	Visit each hot spot for review of storm water pollution prevention practices and distribute public education materials to new facilities qualifying as hot spots
Milestone Year 5	Visit each hot spot for review of storm water pollution prevention practices and distribute public education materials to new facilities qualifying as hot spots
BMP 1B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Storm Water Hot Line/Website
Milestone Year 1	Maintain dedicated hot line for public to report storm water quality complaints/illegal discharges/illegal dumping, etc. - web site will be updated to include additional storm water quality information for public
Milestone Year 2	Update website as needed and put annual report and proposed revisions to construction site ordinance and updates to construction site runoff program on website for public to review and comment
Milestone Year 3	Update website as needed and put annual report on website for public review and comment
Milestone Year 4	Update website as needed and put annual report and proposed revisions to ordinances and other regulatory mechanisms for permanent storm water management on website for public to review and comment
Milestone Year 5	Update website as needed and put annual report on website for public review and comment
BMP 1C	MEASURABLE GOALS AND MILESTONES
Goal(s)	PSAs
Milestone Year 1	Continue PSAs through Tennessee Storm Water Association program
Milestone Year 2	Continue PSAs through Tennessee Storm Water Association program
Milestone Year 3	Continue PSAs through Tennessee Storm Water Association program
Milestone Year 4	Continue PSAs through Tennessee Storm Water Association program
Milestone Year 5	Continue PSAs through Tennessee Storm Water Association program
BMP 1D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Annual Report
Milestone Year 1	Conduct public meeting with proper public notice to present City's annual report for storm water permit

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Milestone Year 2	Conduct public meeting with proper public notice to present City's annual report for storm water permit
Milestone Year 3	Conduct public meeting with proper public notice to present City's annual report for storm water permit
Milestone Year 4	Conduct public meeting with proper public notice to present City's annual report for storm water permit
Milestone Year 5	Conduct public meeting with proper public notice to present City's annual report for storm water permit

BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION	
BMP 2A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Illicit Discharge Ordinance
Milestone Year 1	Modify existing storm water ordinance to prohibit contamination of storm water runoff from hot spots and incorporate allowable discharges identified in general storm water permit into ordinance
Milestone Year 2	Evaluate effectiveness of illicit discharge component of storm water ordinance and modify as necessary
Milestone Year 3	Evaluate effectiveness of illicit discharge component of storm water ordinance and modify as necessary
Milestone Year 4	Evaluate effectiveness of illicit discharge component of storm water ordinance and modify as necessary
Milestone Year 5	Evaluate effectiveness of illicit discharge component of storm water ordinance and modify as necessary
BMP 2B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Storm System Map
Milestone Year 1	Update existing storm water outfall map to meet general storm water permit requirements (hot spots will be identified on map)
Milestone Year 2	Revise storm water outfall map with new outfalls and hot spots
Milestone Year 3	Revise storm water outfall map with new outfalls and hot spots
Milestone Year 4	Revise storm water outfall map with new outfalls and hot spots
Milestone Year 5	Revise storm water outfall map with new outfalls and hot spots
BMP 2C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Implement Illicit Discharge Program
Milestone Year 1	Develop an illicit discharge plan and procedures to meet general storm water permit requirements and include targeting hot spots and field screening of storm water outfalls as part of the City's storm water management program
Milestone Year 2	Evaluate effectiveness of illicit discharge program and perform follow-up screening of outfalls
Milestone Year 3	Evaluate effectiveness of illicit discharge program and perform follow-up screening of outfalls
Milestone Year 4	Evaluate effectiveness of illicit discharge program and perform follow-up screening of outfalls
Milestone Year 5	Evaluate effectiveness of illicit discharge program and perform follow-up screening of outfalls
BMP 2D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Public Education for illicit discharges
Milestone Year 1	Develop public education program for public targeted audiences addressing water quality impacts of illegal discharges and improper disposal of wastes into the storm sewer system
Milestone Year 2	Evaluate effectiveness of public education program for illicit discharges, document any public reports and follow-up actions related to illicit discharges and modify program as necessary
Milestone Year 3	Evaluate effectiveness of public education program for illicit discharges, document any public reports and follow-up actions related to illicit discharges and modify program as necessary
Milestone Year 4	Evaluate effectiveness of public education program for illicit discharges, document any public reports and follow-up actions related to illicit discharges and modify program as necessary
Milestone Year 5	Evaluate effectiveness of public education program for illicit discharges, document any public reports and follow-up actions related to illicit discharges and modify program as necessary

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BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM	
BMP 3A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Construction Site Ordinance
Milestone Year 1	Revise construction site component of the storm water ordinance to control wastes from construction site and for consistency with the current CGP
Milestone Year 2	Revise construction site component of the storm water ordinance and other regulatory mechanisms to meet requirements of municipal storm water permit
Milestone Year 3	Evaluate effectiveness of construction site component of storm water ordinance and other regulatory mechanisms and revise as necessary
Milestone Year 4	Evaluate effectiveness of construction site component of storm water ordinance and other regulatory mechanisms and revise as necessary
Milestone Year 5	Evaluate effectiveness of construction site component of storm water ordinance and other regulatory mechanisms and revise as necessary
BMP 3B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Priority Construction sites
Milestone Year 1	Develop procedures for recognizing and inspecting priority construction sites
Milestone Year 2	Evaluate effectiveness of priority construction site inspections and revise as necessary
Milestone Year 3	Evaluate effectiveness of priority construction site inspections and revise as necessary
Milestone Year 4	Evaluate effectiveness of priority construction site inspections and revise as necessary
Milestone Year 5	Evaluate effectiveness of priority construction site inspections and revise as necessary
BMP 3C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Construction Site Runoff Program Plan
Milestone Year 1	Develop a construction site runoff program with standard operating procedures as part of the City's storm water management program
Milestone Year 2	Evaluate effectiveness of construction site runoff program and revise as necessary
Milestone Year 3	Evaluate effectiveness of construction site runoff program and revise as necessary
Milestone Year 4	Evaluate effectiveness of construction site runoff program and revise as necessary
Milestone Year 5	Evaluate effectiveness of construction site runoff program and revise as necessary
BMP 3D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Enforcement of Erosion and Sediment Control Requirements
Milestone Year 1	Evaluate existing enforcement program for erosion and sediment control violations and modify as necessary
Milestone Year 2	Evaluate effectiveness of enforcement program for erosion and sediment control and revise as necessary
Milestone Year 3	Evaluate effectiveness of enforcement program for erosion and sediment control and revise as necessary
Milestone Year 4	Evaluate effectiveness of enforcement program for erosion and sediment control and revise as necessary
Milestone Year 5	Evaluate effectiveness of enforcement program for erosion and sediment control and revise as necessary

BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM	
BMP 4A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Post-Construction Ordinance
Milestone Year 1	Revise existing post-construction component of storm water ordinance to incorporate post-construction requirements of municipal storm water general permit
Milestone Year 2	Evaluate effectiveness of post-construction component of storm water ordinance and revise as necessary

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Milestone Year 3	Evaluate effectiveness of post-construction component of storm water ordinance and revise as necessary
Milestone Year 4	Revise post-construction ordinance to include green infrastructure and infiltration and other requirements of the municipal storm water general permit
Milestone Year 5	Evaluate effectiveness of post-construction component of storm water ordinance and revise as necessary

BMP 4B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Post-Construction Procedures
Milestone Year 1	Develop a post-construction strategy and standard operating procedures as part of the City's storm water management program
Milestone Year 2	Evaluate effectiveness of post-construction strategy and standard operating procedures and revise as necessary
Milestone Year 3	Evaluate effectiveness of post-construction strategy and standard operating procedures and revise as necessary
Milestone Year 4	Evaluate effectiveness of post-construction strategy and standard operating procedures and revise as necessary
Milestone Year 5	Evaluate effectiveness of post-construction strategy and standard operating procedures and revise as necessary

BMP 4C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Post-Construction BMP Guidance
Milestone Year 1	Adopt appropriate guidance manual for post-construction BMPs applicable for the City of Springfield
Milestone Year 2	Evaluate effectiveness of post-construction BMPs and revise as necessary
Milestone Year 3	Evaluate effectiveness of post-construction BMPs and revise as necessary
Milestone Year 4	Incorporate appropriate post-construction BMPs for green infrastructure and infiltration into City's post-construction strategy
Milestone Year 5	Evaluate effectiveness of post-construction BMPs and revise as necessary

BMP 4D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Maintenance Requirements for Post-Construction BMPs
Milestone Year 1	Revise existing maintenance requirements to meet new municipal storm water general permit requirements
Milestone Year 2	Evaluate effectiveness of post-construction maintenance requirements and revise as necessary
Milestone Year 3	Evaluate effectiveness of post-construction maintenance requirements and revise as necessary
Milestone Year 4	Evaluate effectiveness of post-construction maintenance requirements and revise as necessary
Milestone Year 5	Evaluate effectiveness of post-construction maintenance requirements including green infrastructure and infiltration BMPs and revise as necessary

BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING	
BMP 5A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Operation and Maintenance Program
Milestone Year 1	Develop and implement an operations and maintenance program with a training component and standard operating procedures as part of the City's storm water management program to reduce storm water pollution from municipal operations
Milestone Year 2	Evaluate effectiveness of operations and maintenance program and revise as necessary
Milestone Year 3	Evaluate effectiveness of operations and maintenance program and revise as necessary
Milestone Year 4	Evaluate effectiveness of operations and maintenance program and revise as necessary
Milestone Year 5	Evaluate effectiveness of operations and maintenance program and revise as necessary
BMP 5B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Pollutant Reduction From Streets and Roads

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Milestone Year 1	Review existing procedures to reduce pollutants conveyed by storm water runoff from street and road surfaces and revise as necessary
Milestone Year 2	Evaluate effectiveness of procedures to reduce pollutants conveyed by storm water runoff from street and road surfaces and revise as necessary
Milestone Year 3	Evaluate effectiveness of procedures to reduce pollutants conveyed by storm water runoff from street and road surfaces and revise as necessary
Milestone Year 4	Evaluate effectiveness of procedures to reduce pollutants conveyed by storm water runoff from street and road surfaces and revise as necessary
Milestone Year 5	Evaluate effectiveness of procedures to reduce pollutants conveyed by storm water runoff from street and road surfaces and revise as necessary
BMP 5C	MEASURABLE GOALS AND MILESTONES
Goal(s)	
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	
BMP 5D	MEASURABLE GOALS AND MILESTONES
Goal(s)	
Milestone Year 1	
Milestone Year 2	
Milestone Year 3	
Milestone Year 4	
Milestone Year 5	